

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:18-cv-01813-RDM**

CONNELL v. UNITED STATES SOUTHERN COMMAND  
Assigned to: Judge Randolph D. Moss  
Cause: 05:552 Freedom of Information Act

Date Filed: 08/01/2018  
Jury Demand: None  
Nature of Suit: 895 Freedom of Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff****JAMES G. CONNELL, III**

represented by **JAMES G. CONNELL, III**  
7604 Edenwood Ct.  
Bethesda, MD 20817  
703-623-8410  
PRO SE

**James G. Connell , III**  
CONNELL LAW  
PO Box 141  
Cabin John, MD 20818  
(703) 623-8410  
Email: [jconnell@connell-law.com](mailto:jconnell@connell-law.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

V.

**Defendant****UNITED STATES SOUTHERN  
COMMAND**

represented by **Fred Elmore Haynes**  
U.S. ATTORNEY'S OFFICE FOR THE  
DISTRICT OF COLUMBIA  
555 Fourth Street, NW  
Washington, DC 20530  
(202) 252-2550  
Email: [fred.haynes@usdoj.gov](mailto:fred.haynes@usdoj.gov)  
**TERMINATED: 06/27/2019**  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**John Cuong Truong**  
U.S. ATTORNEY'S OFFICE FOR THE  
DISTRICT OF COLUMBIA  
555 Fourth Street, NW  
Washington, DC 20530  
(202) 252-2524  
Fax: (202) 252-2599  
Email: [john.truong@usdoj.gov](mailto:john.truong@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
08/01/2018	<u>1</u>	COMPLAINT against UNITED STATES SOUTHERN COMMAND (Filing fee \$ 400, receipt number 4616093920) filed by JAMES G. CONNELL, III. (Attachment: # <u>1</u> Civil Cover Sheet) (tth) (Entered: 08/02/2018)
08/01/2018		SUMMONS (4) Issued as to UNITED STATES SOUTHERN COMMAND, U.S. Attorney (2), and U.S. Attorney General. (tth) (Entered: 08/02/2018)

08/02/2018	<u>2</u>	STANDING ORDER: The parties are hereby ORDERED to comply with the directives set forth in the Court's Standing Order. See document for details. Signed by Judge Randolph D. Moss on 8/2/2018. (lcrdm1, ) (Entered: 08/02/2018)
09/05/2018	<u>3</u>	Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint by UNITED STATES SOUTHERN COMMAND (Haynes, Fred) (Entered: 09/05/2018)
09/07/2018		MINUTE ORDER: Upon consideration of the Consent Motion for an Extension of Time <u>3</u> , it is hereby ORDERED that the motion is GRANTED. Defendant shall answer or otherwise respond to the complaint on or before September 12, 2018. Signed by Judge Randolph D. Moss on 9/7/2018. (lcrdm1, ) (Entered: 09/07/2018)
09/07/2018		Set/Reset Deadlines: Defendant shall answer or otherwise respond to the complaint on or before 9/12/2018. (kt) (Entered: 09/07/2018)
09/12/2018	<u>4</u>	ANSWER to <u>1</u> Complaint by UNITED STATES SOUTHERN COMMAND.(Haynes, Fred) (Entered: 09/12/2018)
09/13/2018		MINUTE ORDER: It is hereby ORDERED that the parties shall appear for a status conference on October 2, 2018, at 10:15 a.m. in Courtroom 21. It is further ORDERED that the parties shall meet and confer prior to the status conference to discuss the status of the Department's search and scheduling for further proceedings. Signed by Judge Randolph D. Moss on 9/13/2018. (lcrdm1, ) (Entered: 09/13/2018)
09/14/2018		Set/Reset Hearings: Status Conference set for 10/2/2018, at 10:15 AM, in Courtroom 21, before Judge Randolph D. Moss. (kt) (Entered: 09/14/2018)
10/02/2018		Minute Entry for proceedings held before Judge Randolph D. Moss: Status Conference held on 10/2/2018. Defendant to provide responsive documents to Plaintiff by 10/25/2018. Oral motion by Plaintiff for leave of court to receive filings electronically; HEARD and GRANTED. The Clerk's office shall activate Plaintiff's existing ECF login credentials for use in this case. A further Status Conference is set for 10/31/2018, at 10:30 AM, in Courtroom 21, before Judge Randolph D. Moss. (Court Reporter: Jeff Hook.) (kt) (Entered: 10/02/2018)
10/31/2018		Minute Entry for proceedings held before Judge Randolph D. Moss: Status Conference held on 10/31/2018. Joint Status Report due on or before 1/4/2019. (Court Reporter: Jeff Hook.) (kt) (Entered: 10/31/2018)
01/04/2019	<u>5</u>	STATUS REPORT by JAMES G. CONNELL, III. (ztd) (Entered: 01/11/2019)
05/14/2019	<u>6</u>	PROPOSED BRIEFING SCHEDULE ( <i>JOINT</i> ) by UNITED STATES SOUTHERN COMMAND. (Haynes, Fred) (Entered: 05/14/2019)
06/05/2019		MINUTE ORDER: Upon consideration of the parties' joint proposed schedule, it is hereby ORDERED that the following schedule shall govern proceedings in this case: Defendant shall file its summary judgment motion on or before June 7, 2019; Plaintiff shall file its response to that motion and any cross-motion for summary judgment on or before July 8, 2019; Defendant shall file its reply on or before July 22, 2019; and Plaintiff shall file its reply, if any, on or before July 29, 2019. Signed by Judge Randolph D. Moss on 6/5/2019. (lcrdm1, ) (Entered: 06/05/2019)
06/06/2019		Set/Reset Deadlines: Defendant shall file its summary judgment motion on or before 6/7/2019; Plaintiff shall file its response to that motion and any cross-motion for summary judgment on or before 7/8/2019; Defendant shall file its reply on or before 7/22/2019; and Plaintiff shall file its reply, if any, on or before 7/29/2019. (kt) (Entered: 06/06/2019)
06/07/2019	<u>7</u>	Consent MOTION for Extension of Time to File <i>Defendant's Motion for Summary Judgment</i> by UNITED STATES SOUTHERN COMMAND (Haynes, Fred) (Entered: 06/07/2019)
06/12/2019		MINUTE ORDER: Upon consideration of Defendant's motion for extension of time, Dkt. <u>7</u> , it is hereby ORDERED that the motion is GRANTED. Defendant shall file its motion for summary judgment on or before June 17, 2019. Signed by Judge Randolph D. Moss on 6/12/2019. (lcrdm1, ) (Entered: 06/12/2019)
06/12/2019		Set/Reset Deadlines: Defendant's Summary Judgment Motion due by 6/17/2019. (dot) (Entered: 06/12/2019)

06/17/2019	<u>8</u>	Consent MOTION for Extension of Time to File <i>Defendant's Motion for Summary Judgment</i> by UNITED STATES SOUTHERN COMMAND (Haynes, Fred) (Entered: 06/17/2019)
06/20/2019		MINUTE ORDER: Upon consideration of the consent motion for extension, Dkt. <u>8</u> , it is hereby ORDERED that the motion is GRANTED. Defendant shall file its motion for summary judgment on or before July 29, 2019. Signed by Judge Randolph D. Moss on 6/20/2019. (lcrdm1, ) (Entered: 06/20/2019)
06/20/2019		Set/Reset Deadlines: Defendant's Summary Judgment motion due by 7/29/2019. (kt) (Entered: 06/20/2019)
06/27/2019	<u>9</u>	NOTICE OF SUBSTITUTION OF COUNSEL by John Cuong Truong on behalf of All Defendants Substituting for attorney Fred Haynes (Truong, John) (Entered: 06/27/2019)
07/29/2019	<u>10</u>	MOTION for Extension of Time to <i>File Motion for Summary Judgment</i> by UNITED STATES SOUTHERN COMMAND (Truong, John) (Entered: 07/29/2019)
07/29/2019	<u>11</u>	NOTICE of Plaintiff's Position and Filing of Exhibits by UNITED STATES SOUTHERN COMMAND re <u>10</u> MOTION for Extension of Time to <i>File Motion for Summary Judgment</i> (Truong, John) (Entered: 07/29/2019)
08/05/2019		MINUTE ORDER: Upon consideration of Defendant's unopposed Motion for Extension of Time to file its Motion for Summary Judgment, Dkt. <u>10</u> , it is hereby ORDERED that the motion is granted. Defendant shall file its Motion for Summary Judgment on or before September 29, 2019. Signed by Judge Randolph D. Moss on 08/05/2019. (lcrdm1, ) (Entered: 08/05/2019)
08/06/2019		Set/Reset Deadlines: Summary Judgment motion due by 9/29/2019. (kt) (Entered: 08/06/2019)
09/26/2019	<u>12</u>	Consent MOTION for Extension of Time to <i>Motion for Summary Judgment</i> by UNITED STATES SOUTHERN COMMAND (Truong, John) (Entered: 09/26/2019)
09/26/2019		MINUTE ORDER: Upon consideration of Defendant's consent motion for an extension of time to file motion for summary judgment, Dkt. <u>12</u> , it is hereby ORDERED that the motion is GRANTED. It is further ORDERED that Defendant shall file its motion for summary judgment on or before October 11, 2019. Signed by Judge Randolph D. Moss on 9/26/19. (lcrdm1, ) (Entered: 09/26/2019)
09/26/2019		Set/Reset Deadlines: Defendant's Summary Judgment motion due by 10/11/2019. (kt) (Entered: 09/26/2019)